

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 20 CR 00418-1
)	
v.)	Judge John A. Ross
)	
JAMES TIMOTHY NORMAN,)	
)	
Defendant.)	

DEFENDANT’S UNOPPOSED MOTION TO CONTINUE SENTENCING

Defendant, James Timothy Norman, by and through his attorneys, pursuant to the Due Process and Effective Assistance of Counsel provisions of the Fifth and Sixth Amendments to the Constitution of the United States, respectfully requests that the Court enter an Order continuing Mr. Norman’s sentencing hearing to a date amenable to the Court as discussed below.

1. On September 16, 2022, Mr. Norman was found guilty of conspiracy to commit murder for hire, murder for hire, and conspiracy to commit wire and/or mail fraud (Counts One, Two, and Three), in violation of 18 U.S.C. §§ 1958, 1349, and 2, respectively. Dkt. Nos. 401 and 407.

2. On the same day, the Court entered its Order scheduling the sentencing hearing in this matter for December 15, 2022. Dkt. No. 408.

3. Mr. Norman’s sentencing is currently scheduled for December 15, 2022. *Id.*

4. Counsel for Mr. Norman is currently scheduled to be engaged in trial on the following matters, on the following dates:

- (i) *United States v. Goncharova*, No. 19 CR 745-2, before Judge Franklin U. Valderrama in the United States District Court for the Northern District of Illinois, which is scheduled to begin on December 8, 2022, and last until approximately December 16, 2022;

- (ii) *United States v. Garrett*, No. 18 CR 880, before Judge Elaine E. Bucklo in the United States District Court for the Northern District of Illinois, which is scheduled to begin on January 9, 2023, and last until approximately January 13, 2023;
- (iii) *United States v. Bell*, No. 19 CR 451-2, before Judge John Robert Blakey in the United States District Court for the Northern District of Illinois, which is scheduled to begin on January 23, 2023, and last until approximately January 27, 2023;
- (iv) *Brown v. G-Force Employment Professions, LLC*, No. 22 CH 7881, before Judge John Curry, Jr. in the Circuit Court of Cook County, Illinois, which is scheduled to begin February 1, 2023, and last until approximately February 3, 2023; and
- (v) *United States v. Gallagher*, No. 21 L 004911, before Judge Mary Colleen Roberts in the Circuit Court of Cook County, Illinois, which is scheduled to begin on February 6, 2023, and last until approximately February 14, 2023.

5. As such, counsel respectfully request that the Court continue the sentencing in this matter until (i) February 15, 2023; (ii) February 16, 2023; (iii) February 17, 2023; (iv) a date during the week of February 21, 2023; or (v) a date amenable to this Court.¹

6. Counsel has conferred with the government and can represent it has no objection to this request.

¹ For potential scheduling purposes, counsel would also note that counsel is scheduled to be on trial March 6-17, 2023, and March 20-31, 2023, in *United States v. Palma*, No. 20 CR 707, before Judge Robert W. Gettleman in the Northern District of Illinois, and *United States v. Peters*, No. 21 CR 50035, before Judge Matthew F. Kennelly in the Northern District of Illinois, respectively, and would be unavailable on those dates.

WHEREFORE Defendant James Timothy Norman respectfully requests that the Court enter an Order continuing Mr. Norman's sentencing hearing to a date amenable to the Court as discussed herein.

Respectfully submitted,

s/ Kelsey H. Killion

KELSEY H. KILLION, One of the
attorneys for Defendant.

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CERTIFICATE OF SERVICE

The undersigned, an attorney, states that, on October 20, 2022, she caused to be filed and served on all counsel of record, the foregoing document, using this Court's ECF filing system.

s/ Kelsey H. Killion
KELSEY H. KILLION